

NRC INSPECTION MANUAL

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INSPECTION MANUAL CHAPTER 2562

**LIGHT-WATER REACTOR INSPECTION PROGRAM FOR RESTART OF REACTOR
FACILITIES FOLLOWING PERMANENT CESSATION OF POWER OPERATIONS**

Effective Date: 05/08/2024

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2562-01 PURPOSE

- 01.01 To establish oversight policies, requirements, and guidance for transitioning from a decommissioning reactor facility to an operational power reactor facility subject to the Reactor Oversight Process (ROP).
- 01.02 To detail the requirements for the inspection activities and operational plant readiness to provide reasonable assurance for safe operations following reactivation of an operating license.
- 01.03 To ensure other federal agencies, state and local governments, tribal governments, the public, and other applicable stakeholders are engaged and informed.

2562-02 OBJECTIVES

- 02.01 To provide guidance on the establishment of a restart panel to help coordinate oversight.
- 02.02 To provide guidance for developing an objective and documented basis for any Nuclear Regulatory Commission (NRC) decision to transition to the ROP and resumption of power. This includes how the combination of licensing and inspection provides reasonable assurance for:
 - operability and functionality of structures systems and components (SSCs) at the facility necessary to support resumption of power operations, and
 - operational readiness of the reactor facility.

2562-03 APPLICABILITY

- 03.01 This Inspection Manual Chapter (IMC) provides inspection guidance for the restart of a reactor facility following the permanent cessation of plant operations and removal of fuel from the reactor.

2562-04 DEFINITIONS

- 04.01 Restart. The transition of a decommissioning reactor to an operational reactor facility subject to the ROP.
- 04.02 Restart of Reactor Facilities Inspection Process. The inspection plan to transition a decommissioning reactor to an operational reactor facility subject to the ROP.
- 04.03 Restart Panel. A panel formed to oversee the restart of a reactor facility. The restart panel serves as the focal point for project status and coordination and generally consists of participants from the NRC Headquarters offices (the Offices of Nuclear Reactor Regulation (NRR), Nuclear Security and Incident Response (NSIR), General Counsel, and Nuclear Material Safety and Safeguards (NMSS)) and the applicable regional office.

- 04.04 ROP Transition Plan. The plan used to gain reasonable assurance of adequate protection of public health and safety prior to fuel loading and resumption of power operations.

2562-05 RESPONSIBILITIES AND AUTHORITIES

05.01 Director, Office of Nuclear Reactor Regulation (NRR)

- a. In coordination with the applicable Regional Administrator (RA), establishes a restart panel and charter and assigns panel members.
- b. Provides overall program direction for the restart inspection program.
- c. Develops policies, programs, and procedures for performing inspections at the reactor facility undergoing restart.
- d. Assesses the effectiveness, uniformity, and completeness of implementation of the reactor facility inspections.
- e. Reviews the restart panel's assessment to transition to an operational status and the plant returning to the ROP.
- f. Agrees, in conjunction with the applicable RA, with the licensee's readiness assessment to transition to an operational status and to the ROP.

05.02 Director, Division of Reactor Oversight (DRO)

- a. Develops and prepares revisions to this IMC and other applicable inspection program documents.
- b. Oversees the implementation of the inspection program for the reactor facility undergoing restart.
- c. Serves as the primary NRR contact about oversight and inspection activities with the applicable regional office for the reactor facility undergoing restart.
- d. Assigns a program lead for inspection and oversight coordination for the reactor facility undergoing restart.
- e. Develops an ROP transition plan in cooperation with the Regional Division of Operating Reactor Safety (DORS) Director.

05.03 Director, Division of Operating Reactor Licensing (DORL)

- a. Serves as NRR lead for licensing and licensing policy issues related to the reactor facility undergoing restart.
- b. Assigns a project manager to address day-to-day matters concerning the coordination and processing of licensing issues (e.g. license amendments, technical, reviews, etc.) for the reactor facility undergoing restart.

- c. Coordinates with the applicable region to ensure licensing efforts and the inspection program are integrated.

05.04 Director, Office of Enforcement (OE)

Ensures consistent application of the enforcement process.

05.05 Office of the General Counsel (OGC)

Participates as a member on the restart panel and provides legal advice with respect to NRC program activities associated with restart activities, such as advising the restart panel and associated staff.

05.06 Regional Administrator, applicable region

- a. Has responsibility and authority for the overall direction of the implementation of the inspection program for the reactor facility undergoing restart.
- b. Ensures that stakeholders, such as federal, state, and local governments; tribal governments; and the public are engaged early in the process and kept well informed during the entirety of the restart activities.
- c. Establishes contacts with the applicant or licensee on inspection-related issues and any corrective actions prior to fuel loading and returning the reactor facility to the ROP either directly or through the assigned regional branch chief(s).
- d. Maintains contacts with NRR and NSIR on inspection-related issues and the overall inspection program for the reactor facility undergoing restart either directly or through the assigned regional branch chief(s).
- e. Agrees, in conjunction with the NRR Director, with the licensee's readiness assessment to transition to an operational status and to the ROP.
- f. In coordination with the NRR Office Director, concurs on the establishment of a restart panel, associated charter, and panel member assignments.

05.07 Director, Division of Operating Reactor Safety (DORS), applicable region.

- a. Determines the resources, skills, and disciplines needed to support restart inspections.
- b. In coordination with DRO, identifies the need for a restart panel and recommends the institution of a restart panel to the RA, as needed.
- c. Identifies a team lead to address day-to-day matters and to lead and coordinate all inspection activities at the facility.
- d. Concurs on the ROP transition plan.

05.08 Director, Division of Radiological Safety and Security (DRSS), applicable region

- a. Determine the resources, skills and disciplines needed to support restart inspections.

- b. Re-establishes the NRC's incident response program for the reactor facility undergoing restart.

05.09 Director, Office of NSIR

- a. Provides overall program direction for the security and emergency planning (EP) inspection program.
- b. Issues policies associated with the inspection of security and EP.
- c. Provides overall assessment of security and EP inspection effectiveness, uniformity, and completeness.

05.10 Director, Division of Security Operations (DSO)

- a. By coordinating with other offices and divisions, develops policies, programs, and procedures for performing inspections related to security at reactor facilities undergoing restart.
- b. Serves as a source of technical expertise for security.
- c. Provides NSIR security-related inspection resources. Reviews security inspection plans and schedules, assists in the coordination of security inspections, as requested.

05.11 Director, Division of Preparedness and Response (DPR)

- a. Develops policies, programs, inspection plans, and procedures for performing inspections related to EP at reactor facilities undergoing restart.
- b. Serves as a source of technical expertise for EP.
- c. Provides NSIR EP-related inspection resources. Reviews EP inspection plans and schedules, assists in the coordination of EP inspections, as requested.

05.12 Director, Division of Physical and Cybersecurity Policy (DPCP)

- a. Develops policies, programs, inspection plans, and procedures for performing inspections related to physical and cybersecurity at reactor facilities undergoing restart.
- b. Serves as a source of technical expertise for physical and cybersecurity.
- c. Provides NSIR physical and cybersecurity-related inspection resources.

05.13 Director, Office of NMSS

- a. Provides overall program direction for the decommissioning and environmental inspection program.
- b. Issues financial and environmental policies associated with inspection of a decommissioning facility.
- c. Provides overall assessment of decommissioning inspection effectiveness, uniformity, and completeness.

05.14 Director, Division of Decommissioning, Uranium Recovery, and Waste Programs (DUWP)

- a. Implements the Reactor Decommissioning Oversight Program.
- b. Manages complex decommissioning oversight activities for reactor decommissioning and terminates licenses when decommissioning is complete.
- c. Develops decommissioning oversight policy and guidance and manages programmatic activities.
- d. Coordinates with DORL on licensing activities for transitioning a facility from decommissioning to operating,

05.15 Director, Division of Rulemaking, Environmental, and Financial Support (REFS).

- a. Leads environmental reviews for the NRC's licensing actions related to a decommissioning facility attempting to restart.
- b. Develops and issues appropriate documents to meet the regulatory obligations under the National Environmental Policy Act and coordinates these activities with other federal, state, local, and tribal agencies.
- c. Ensures licensee compliance with decommissioning funding assurance requirements.
- d. Assesses financial qualifications and decommissioning funding assurance requirements for reactor licensees.

05.16 Restart Panel

A restart panel consisting of participants from NRC Headquarters offices (NRR, NSIR, and NMSS) and the applicable regional office should be created. This panel should be co-chaired by NRR/DRO, NRR/DORL and the applicable regional office at the Director/Deputy Director level. The panel has the following responsibilities:

- a. Oversees project completion.
- b. Serves as the focal point for status of the project and for coordination between the region and the NRC Headquarters Offices.
- c. Create and implement the restart panel's charter.
- d. Keeps the public and governmental stakeholders informed of the project and its progress. Addresses questions from these stakeholders or the media with the assistance of the Office of Congressional Affairs (OCA), the Office of Public Affairs (OPA), and the Regional State Liaison Officers.
- e. Issues a memorandum documenting their assessment regarding the licensee's readiness to transition to an operational status to the RA and NRR Director.
- f. Serves as NRR contact concerning licensing and licensing policy issues related to the reactor facility undergoing restart inspection program.

- g. Monitors actual use of resources and recommends any changes.
- h. Conducts a self-assessment or lessons learned at the end of the IMC 2562 process and documents results in a memo to NRR.

2562-06 REQUIREMENTS AND GUIDANCE

06.01 General Inspection Policy

The applicable regional office shall develop an inspection plan based on the licensee's restart activities. The restart panel shall review this plan. This plan shall sample and assess key aspects of licensee operational readiness and, as appropriate, shall review the licensee's reestablishment of previously approved programs, and new programs, if created, required to support reasonable assurance of adequate protection of public health and safety. When operational readiness has been reasonably verified across the ROP cornerstones of safety, the NRC will authorize transition of the facility to the ROP.

06.02 Restart Panel

- a. Membership. The RA, in coordination with the NRR Office Director, will decide when to establish the restart panel, the composition of the restart panel, who will fill the co-chair positions, and the responsibilities of the restart panel (see Responsibilities and Authorities section). The restart panel will ensure that the NRC staff conducts its licensing and regulatory activities in a risk-informed manner that provides reasonable assurance of adequate protection of public health and safety, promotes the common defense and security, and protects the environment.

The restart panel will typically consist of the following individuals, or those in similar positions depending on the reasons for shutdown and start up and the operational phase (e.g., decommissioning) of the facility:

- Co-chairs:
 - NRR Director/Deputy Director, DRO,
 - NRR Director/Deputy Director, DORL, and
 - Applicable Director/Deputy Director, DORS.
- Members:
 - NSIR Director/Deputy Director, DPPCP,
 - NSIR Director/Deputy Director, DPR,
 - NSIR Director/Deputy Director, DSO,
 - OGC,
 - NMSS Director/Deputy Director, DUWP,

- NMSS Director/Deputy Director, Division of Rulemaking, Environmental, and Financial Support.

Members can be added to or removed from the restart panel as appropriate, depending on the operational state of the plant (e.g., decommissioning) and the matters to be evaluated before ROP Transition can be authorized.

- b. Restart Panel Objectives. Upon implementation of this IMC and establishment of the restart panel, the restart panel should promptly determine the type and extent of audits, inspections and oversight activities needed. The restart panel should develop a restart panel Charter, and a Communication Plan. At the end of the restart activities, the restart panel should conduct an IMC 2562 Effectiveness Review, as discussed below.
- c. Restart Panel Charter. The restart panel Charter should state the following:
 - purpose
 - composition of the restart panel (e.g. co-chairs and applicable members from NRC organizations involved with inspection, enforcement, security, operations, decommissioning, and nuclear materials)
 - objectives (e.g., resolving any licensing, inspection, or regulatory challenges that concern the restart of the plant)
 - scope of activities, some examples of scope activities are as follows:
 - resource management (e.g., prioritizing and tracking resources and tracking organizational boundaries to meet inspection and licensing objectives as needed, which includes inspection, licensing and Return to Reactor Oversight Process)
 - project planning and execution (e.g., overall project planning among the NRC offices participating in oversight, licensing, and restart activities)
 - communications (e.g., each office maintaining a communication plan, informing key external stakeholders such as the state and congressional representatives by coordinating with the OPA and the OCA, respectively)
 - oversight (e.g., the restart panel oversight activities may include: 1) being cognizant of restart activities, conducting public meetings, assessing ongoing NRC inspections, and resolving technical and regulatory issues; 2) overseeing the coordination of safety, security, and EP interfaces, and ensuring that issues in these areas are communicated to affected NRC staff; 3) maintaining cognizance of inspection performance and associated metrics (technical assistance requests, violations, allegations); 4) Identifying issues that affect any of these oversight functions and facilitate their timely resolution; and 5) providing support to the hearing process)
 - panel meeting frequency (e.g., occurring twice per quarter to ensure that schedules are met, and new and existing activities are identified and tracked through completion)

- restart panel duration (e.g., remaining in effect until the NRC reaches decisions on all the licensing actions, exemptions, technical issues, and inspections required for, the reactor facility to transition to the ROP and resume commercial operation or until a point mutually agreed upon by the Director of NRR and the RA)
 - estimated number and frequency of public meetings (e.g., conducting quarterly meetings throughout the calendar year to discuss the status of the restart program, significant inspection and licensing issues and the transition to operations)
 - outcomes (e.g., the dispositioning of licensing actions reviewed, and inspections conducted in accordance with the appropriate processes and providing a final memorandum to the Director of NRR and RA of the applicable region, summarizing the efforts of the restart panel and providing any recommendations, should other licensees choose to pursue the restart of a reactor after exiting a decommissioning phase)
 - documentation (e.g., designating a repository of information in addition to the Agencywide Documents Access and Management System (ADAMS) where the restart panel members and staff will collaborate)
- d. Communication Plan. The goal of the Communication Plan is to enable efficient, effective, and transparent communication with internal and external stakeholders regarding the status of plant activities and the IMC 2562 process. The Communication Plan should include communication of information from the initial decision to restart the facility, through the ongoing oversight activities and the transition to operational status and concluding with the post-restart activities.

In conjunction with the Communication Plan, the restart panel should establish a Communication Team with diverse membership, including non-restart panel members (e.g., staff from the Office of the Executive Director for Operations (OEDO), OCA, and OPA), to ensure coordination among NRC offices. A communication matrix or other tracking device may be developed to document and track receipt and response to all significant internal and all external communications (letters and e-mails) to ensure they are properly dispositioned. Appendix A, "Communication Plan," provides additional details and guidance.

- e. Transition to Operational Status Issues List. The Transition to Operational Status Issues List is an itemized listing of restart issues that contains a description and the status of the issue, and any corresponding status of the NRC regulatory actions and the associated inspection report documentation. Issues will be added to this list that the associated regional office and the restart panel believe need to be resolved before the licensee can transition to an operational status. The restart panel will keep the RA and the Director of NRR informed of any additional risk-significant issues that are added to the checklist.
- f. IMC 2562 Self-Assessment/Effectiveness Review. At the conclusion of the IMC 2562 process, an effectiveness review of the IMC 2562 process should be conducted to provide insights and improvements to the IMC 2562 process. All lessons-learned will be collected by the restart panel. The restart panel will review the lessons-learned and will oversee the compilation of any recommended changes to the ROP from the lessons-learned and ensure they are documented and communicated to the Reactor

Assessment Branch (NRR/DRO/IRAB). Additional guidance on self-assessment and effectiveness reviews can be found in IMC 0307, "Reactor Oversight Process Self-Assessment Program."

06.03 Transition between Oversight Processes

a. Decommissioning Status

Licensees enter the decommissioning reactor inspection program governed by IMC 2561, "Decommissioning Power Reactor Inspection Program," after they have certified under 10 CFR 50.82 (Termination of License) a permanent cessation of operations and permanent removal of fuel from the reactor vessel. Once these certifications are submitted to the NRC, the 10 CFR Part 50 license no longer authorizes operations of the reactor or emplacement or retention of fuel into the reactor vessel.

The facility's licensing basis documents are modified for the permanently-shutdown condition. This includes items such as submitting a Post-Shutdown Analysis Report and Decommissioning Safety Analysis Report, changes to the Emergency Preparedness Plan and Security Plan, technical specifications (TSs), and modifications to once-active SSCs for post-shutdown operations. Inspection Manual Chapter 2561 directs inspection of licensee activities for a decommissioning facility by providing Core inspections (described in appendix A of IMC 2561) and Periodic and Discretionary inspections (as described in appendix B of IMC 2561). These inspection activities are conducted by regional decommissioning inspectors and are dependent on the licensee's schedule and progress of decommissioning efforts.

b. Transition from Decommissioning to Restart Phase

When a licensee determines that they will stop decommissioning activities and pursue restart to an operational status, IMC 2562 will be utilized to create an ROP Transition plan for that transition. As described in attachment 1, "Overview of Transition Activities," a variety of overlapping activities will be occurring to transition a facility from a decommissioning status to an operating status. When a licensee submits a request for exemption from the requirements of 10 CFR 50.82 to allow placing fuel in the reactor vessel and authorizing operation of the reactor, the Restart phase of the reactor facility inspection program can begin. It is anticipated that the NRC's review of licensing actions to restore the operating basis of the facility will occur concurrently with any applicable environmental assessments of the resumption of power operations and with the implementation of the Restart of Reactor Facilities Inspection Process.

c. Restoration of Operational License, SSCs and Operational Programs

The licensing actions shall include, but are not limited to, reviewing restoration of the facility's TSs, emergency preparedness program, and security program for an operating reactor. Also, any site-specific license amendments shall be reviewed, as needed, for specific technical or licensing basis issues. The DORL staff shall determine a timeline for review of these actions and, upon approval, implementation requirements for the licensee prior to transitioning to the ROP.

The restart of reactor facilities inspection process is described in more detail in section 06.04. When the licensee has completed their scheduled activities for restart, they will submit an operational readiness letter to the NRC verifying completion of

activities and readiness to implement the operational licensing bases. This letter, along with assessments from the inspection activities, will inform the restart panel's decision-making process for verifying operational readiness to transition the facility back to the ROP and the operating phase. After this decision is made, and the facility has implemented the required operating license actions, the plant will return to an operational status and oversight will continue under IMC 2515, "Light Water Reactor Inspection Program Operations Phase," and IMC 0305 "Operating Reactor Assessment Program."

06.04 Developing Inspection Plan

Based on review of the licensee's schedule of activities, inspections shall be planned and conducted to gain reasonable assurance of the licensee's operational readiness in ensuring adequate protection of public health and safety. Inspection activities should be integrated with the licensee's schedule and conducted in a manner to support timely assessment and risk-informed decision making. The overall inspection plan and samples selected should be risk-informed based on changes made to the facility, restoration of operating license conditions and bases, and any significant items of interest prior to the facility shutdown. The samples should assess areas under the cornerstones of safety to inform the overall operational readiness of the facility. Existing inspection procedures (IPs) should be used in full or in part to accomplish these inspection activities (reference appendix B, "List of Recommended Inspection Documents," for IPs and IMCs to use as needed). If the circumstances require a unique inspection that is not currently documented in an IP, the inspection plan shall be of sufficient detail for the inspectors to meet the clearly defined inspection objectives. The need for a new IP or temporary instruction to be created and issued in accordance with IMC 0040, "Preparation, Revision, Issuance, and Ongoing Oversight of NRC Inspection Manual Documents," could also be considered if the issue is generic in nature and may apply to other operating reactors.

Development of the inspection plan should also be coordinated with any planned decommissioning inspection efforts at the reactor facility. Decommissioning inspections are still required until the NRC determines that they are no longer needed, or the Commission directs the staff to no longer implement the program. Decommissioning inspections can provide valuable insights into assessment of the licensee's readiness for operations. When creating the inspection plan, determine which cornerstones of safety can be observed through these activities to ensure inspection efforts are not duplicated and are appropriately risk-informed. The decommissioning inspection program has flexibility to modify the program and allocation of resources as necessary based on the reactor facility conditions and activities.

Restart Inspections

Restart inspections shall be documented in quarterly reports or standalone reports, as needed, and shall serve as significant inputs for the basis for returning the reactor to operational status. The regional office and the restart panel, when applicable, shall select appropriate sections of IPs to perform a variety of inspection activities across all cornerstones of safety to verify operational readiness. DRO shall provide guidance and support for the selected IPs. General inspection areas should include, but are not limited to, a review and assessment of:

- the SSCs to evaluate system restoration, including quality assurance controls needed to establish operability/SSC functionality and the design and licensing basis functions
- re-implementation of accredited or NRC-approved licensed operator qualifications and training programs, including simulator fidelity
- re-implementation of accredited or NRC-approved maintenance and technical training programs (e.g., non-licensed operators, security, maintenance, health physics, chemistry, emergency planning, etc.)
- staffing, work hour controls, and fitness-for-duty programs
- regulatory program re-implementation (including any commitment changes) (e.g., corrective action, in-service inspections, containment leakage, fire protection, aging management, maintenance rule, risk-based programs, cybersecurity, security, emergency planning, etc.)
- radiation safety, security, and emergency preparedness plan transitions from decommissioning activities to operational activities
- resolution of open or deferred items not previously completed due to plant shutdown (e.g., regulatory commitments, unresolved items, orders, voluntary initiatives that support safety, etc.)
- evaluation and implementation of major modifications that could affect plant operation and/or support safety
- reconstitution of plant licensing and design basis, as needed

For example, the review of the emergency preparedness program should assess whether all applicable regulatory requirements for onsite and offsite exercises are met prior to returning the plant to an operating status.

The Inspection Plan should be reviewed and modified, as necessary, on at least a quarterly basis, to ensure that the inspection schedule is optimized with anticipated plant activities.

06.05 Performance Indicators

Performance Indicators (PIs) will likely have lapsed or may lack current data depending on the date of permanent shutdown. The inspection plan should include consideration of any inspections necessary to compensate for PIs that lack current data.

Following Restart, several PIs will remain invalid until sufficient data has been collected to calculate each specific PI. In other words, the validity of each PI is dependent on the data needed to calculate the specific PI. The algorithms for calculating the different PIs, and in some cases the thresholds to determine their validity, are contained in NEI 99-02, "Regulatory Assessment Performance Indicator Guideline." As an example, since the Unplanned Scrams and Unplanned Power Changes PIs in the Initiating Events cornerstone are not considered valid if there are fewer than 2,400 critical hours in the previous four quarters, it would typically take two quarters of operational data following

restart for these indicators to be considered valid. Furthermore, starting up with only two quarters of critical hours makes this PI more volatile, meaning it could cross a threshold with a lower number of scrams than was intended.

Mitigating System Performance Index (MSPI) is a valid indicator if supported by 3 years of data. The staff and industry representatives have discussed the validity of MSPIs after extended shutdown and concluded that at least four quarters of operational data are required prior to making these PIs valid for assessment purposes. The staff will evaluate the validity of MSPI indicators on a plant-specific basis via the ROP Working Group and FAQ process (reference January 2014 ROP Public Meeting Summary (ML14041A236)). On the other hand, the Reactor Coolant System (RCS) Activity and RCS Leakage PIs in the Barrier Integrity cornerstone are considered valid with the first quarterly data submittal following restart because the PIs can be calculated using a single month's reported value at steady state power. Questions regarding the potential validity of specific indicators should be referred to NRR/DRO/IRAB.

06.06 Resources

Based on the Inspection Plan, a detailed resource projection should be created. Resource loading will be dependent on projected scheduled dates for activities and any specific agency or contractor qualifications/expertise required for the activities. A cross-functional, agencywide approach should be considered when trying to identify available resources. Efficiencies could be gained by utilizing individuals' diverse qualifications potentially in a variety of areas to accomplish multiple activities in a shorter amount of time.

The reinstitution of site-specific Senior and Resident Inspectors should also be evaluated to assist the Restart of Reactor Facilities Inspection Process most efficiently and to allow ample time for those individuals to become familiar with the reactor facility and associated activities. Supplemental, temporary support for the resident inspectors should also be considered based on the licensee's schedule of activities.

In addition to consideration for a team lead for the restart efforts, consideration should also be given for additional regional-based resources to provide project management, inspection, and allegations support.

06.07 Documentation

The quarterly and standalone reports should document the applicable IPs (or sections within) completed, which SSCs or programs were reviewed, specific notable items related to the samples, as needed, and the basis for selection of the samples (i.e., which cornerstone and attributes were assessed). All reports should follow the guidance in IMC 0611, "Power Reactor Inspection Reports," for documenting inspection activities. Any noteworthy observations, open or unresolved items, and identified findings and violations should be dispositioned per the applicable guidance documents and tracked in the Reactor Program System as inputs into the final operational readiness assessment.

06.08 Completion

When the NRC has verified adequate operational readiness to ensure reasonable assurance of adequate protection of public health and safety, and the applicable restart licensing actions have been issued, the NRC will authorize transition of the facility to the ROP.

2562-07 REFERENCES

IMC 0040, "Preparation, Revision, Issuance, and Ongoing Oversight of NRC Inspection Manual Documents"

IMC 0305, "Operating Reactor Assessment Program"

IMC 0307, "Reactor Oversight Process Self-Assessment Program"

IMC 0350, "Oversight of Reactor Facilities in a Shutdown Condition Due to Significant Performance and/or Operational Concerns"

IMC 0375, "Implementation of the Reactor Oversight Process at Reactor Facilities in an Extended Shutdown Condition for Reasons Not Related to Performance"

IMC 0611, "Power Reactor Inspection Reports"

IMC 1601, "Communication and Coordination Protocol for Determining the Status of Offsite Emergency Preparedness"

IMC 2515, "Light Water Reactor Inspection Program Operations Phase"

IMC 2561, "Decommissioning Power Reactor Inspection Program"

MD 3.5, "Attendance at NRC Staff-Sponsored Meetings"

NEI 99-02, "Regulatory Assessment Performance Indicator Guideline."

"Palisades Restart Panel Charter" (ML23297A053)

END

Appendix A: Communication Plan

Overview

The Communication Plan outlines the tools that will be used to ensure a consistent and accurate message regarding the NRC's oversight activities under the IMC 2562 process. Developing and implementing an effective Communication Plan that satisfies the needs of the NRC, external stakeholders, and the public is a key aspect in ensuring that this program is successfully implemented.

In general, the major items that should be considered for inclusion in the Communication Plan include:

- a. Goal
- b. Background
- c. Audience
- d. Key Message
- e. Communications Activities
- f. Questions and Answers
- g. Timeline

There are several types of formal communication tools, including NRC Daily Notes, Commission Assistant Notes, and press releases. There are also several types of more informal communication tools, such as talking points, Q&As, and one-pagers. Different audiences have different needs, interest levels, and background knowledge. The Communication Team should carefully choose the type(s) of communication tool(s) to be of maximum use and benefit to the intended audience.

Some of the communication tools used at the NRC include:

Press releases	Q&As/FAQs	Brochures
Talking points	Backgrounders	Web pages
NRC Daily Notes	NRC Reporter	Generic Communications
Advertisements	Newsletters	Announcements
Poster/fliers	Videos	EDO Updates
Fact Sheets	Weekly information Report	
Commissioner Assistants Notes	Blog posts	
Federal Register Notices		

The Communication Team should also monitor and track the following as necessary to assist the Chair of the Panel when developing, implementing, and revising the Communication Plan.

Requirement

A communication plan shall be developed to ensure effective communication with internal and external stakeholders and openness in the status of ongoing licensee activities and associated inspection activities, including the responsibilities and methodologies for interactions with the Commission; the Advisory Committee on Reactor Safeguards (ACRS); the media; federal, state, and local officials; tribal governments; and other stakeholders.

Process

The communication plan should consider frequency, extent, and methods to be used for meetings with the licensee and the public. Some communication methods to inform the public about Restart program implementation to be considered are a site-specific oversight web page; NRC social media posts; public meetings; and/or, press releases. In addition to a general communication plan for routine interactions with internal and external stakeholders, the regional office should follow the guidelines of IMC 1601, "Communication and Coordination Protocol for Determining the Status of Offsite Emergency Preparedness."

Scope

Regional management shall determine the need for, and the level of, NRC participation with public stakeholders on a case-by-case basis. The level of appropriate public stakeholder participation varies greatly; the interest of state and local citizens, public interest groups, the media, and elected officials; and the concerns of other government agencies. Public stakeholder meetings have proven to be a valuable vehicle for communications with external stakeholders. These meetings are held to describe the results of the NRC's review of the licensee's activities. FEMA, as well as local, state, and federal law enforcement and other emergency response/support agencies should be involved in public stakeholder meetings that may include significant discussion of the adequacy of offsite emergency preparedness to support plant restart, when appropriate. Furthermore, the regional office, in coordination with NSIR, should anticipate and allow adequate time for FEMA to decide regarding the status of offsite emergency preparedness, as stipulated in IMC 1601.

The regional office will ensure that efforts have been made to establish an open dialogue with local, tribal, and state government officials and agencies. The NRC should ensure that inquiries from Congress, local and state government agencies, and various federal agencies are promptly addressed. Appropriate caution should be exercised to avoid the release of predecisional, proprietary, or safeguards information when responding to inquiries.

Appendix B: List of Recommended Inspection Documents

Operational Strategic Performance Area: Reactor Safety	
IMC/IP No.	Title
0305	Operating Reactor Assessment Program
0308	Reactor Oversight Process Basis Document
2515	Light Water Reactor Inspection Program Operations Phase
2515 App A	Risk-Informed Baseline Inspection Program
2516	Policy and Guidance for the License Renewal Inspection Program
35017	Quality Assurance Implementation Inspection
35101	QA Program Implementation Inspection for Operational Programs
41502	Nuclear Power Plant Simulation Facilities
60715	Spent Fuel Pool Safety at Operating Reactors
71002	License Renewal Inspection
71003	Post-Approval Site Inspection for License Renewal
71111	Reactor Safety-Initiating Events, Mitigating Systems, Barrier Integrity
71111.01	Adverse Weather Protection
71111.04	Equipment Alignment
71111.05	Fire Protection
71111.06	Flood Protection Measures
71111.07	Heat Exchanger/Sink Performance
71111.08	Inservice Inspection Activities
71111.11	Licensed Operator Requalification Program and Licensed Operator Performance
71111.12	Maintenance Effectiveness

IMC/IP No.	Title
71111.13	Maintenance Risk Assessments and Emergent Work Control
71111.15	Operability Determinations and Functionality Assessments
71111.18	Plant Modifications
71111.20	Refueling and Other Outage Activities
71111.21M	Comprehensive Engineering Team Inspection
71111.21N.03	Commercial Grade Dedication
71111.21N.04	Age-Related Degradation
71111.21N.05	Fire Protection Team Inspection (FPTI)
71111.24	Testing and Maintenance of Equipment Important to Risk
71114	Reactor Safety – Emergency Preparedness
71114.01	Exercise Evaluation
71114.02	Alert and Notification System Evaluation
71114.03	Emergency Response Organization Staffing and Augmentation System
71114.04	Emergency Action Level and Emergency Plan Changes
71114.05	Maintenance of Emergency Preparedness
71114.06	Drill Evaluation
71114.08	Exercise Evaluation – Scenario Review
71151	Performance Indicator Verification
71152	Problem Identification and Resolution
71153	Follow up of Events and Notices of Enforcement Discretion

Operational Strategic Performance Area: Radiation Safety	
IMC/IP No.	Title
71124	Radiation Safety—Public and Occupational
71124.01	Radiological Hazard Assessment and Exposure Controls
71124.03	In-Plant Airborne Radioactivity Control and Mitigation
71124.04	Occupational Dose Assessment
71124.05	Radiation Monitoring Instrumentation
71124.06	Radioactive Gaseous and Liquid Effluent Treatment
71124.07	Radiological Environmental Monitoring Program
71124.08	Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation
83523	Radiation Protection, Plant Chemistry, Radwaste, Transportation and Environmental: Training and Qualifications
83527	Facilities and Equipment (Preoperational and Supplemental)
83890	Closeout Inspection and Survey
84521	Radwaste - Startup

Operational Strategic Performance Area: Security	
IMC/IP No.	Title
81000.01	Access Authorization
81000.02	Access Controls
81000.03	Performance Evaluation Program
81000.04	Equipment Performance, Testing, and Maintenance
81000.05	Protective Strategy Evaluation
81000.06	Protection of Safeguards Information
81000.07	Security Training
81000.08	Fitness-for-Duty Operational Program
81000.09	Cyber Security Inspection for Construction
81000.10	Security Organization, Management Effectiveness, Program Reviews and Audits
81000.11	Material Control and Accounting (MC&A)
81000.14	Review of New Reactor Target Sets
84750	Radioactive Waste Treatment, and Effluent and Environmental Monitoring
85103	Material Control and Accounting at Decommissioning Reactors
86750	Solid Radioactive Waste Management and Transportation of Radioactive Materials
87137	10 CFR Part 37 Materials Security Programs

Exhibit 1: Example of IMC 2562 Oversight Panel Charter

[PLANT name] RESTART PANEL CHARTER

This charter defines the responsibilities for the **[Plant name]** Nuclear Plant Restart Panel (RP), as it relates to inspection and licensing activities for **[Plant name]** until commercial operation resumes. The RP will ensure that U.S. Nuclear Regulatory Commission (NRC or Commission) staff conducts its licensing and regulatory activities in a manner that provides reasonable assurance of adequate protection of public health and safety, promotes the common defense and security, and protects the environment.

The RP is an assessment and oversight group chaired by the members listed below.

Co-Chairs:

- Office of Nuclear Reactor Regulation (NRR) Director/Deputy Director, Division of Reactor Oversight
- NRR Director/Deputy Director, Division of Operating Reactor Licensing (DORL)
- Region **[Region number]** Director/Deputy Director, Division of Operating Reactor Safety (DORS)

To oversee project completion, other NRC offices and divisions, as listed below, will participate in the RP, as necessary:

Members:

- Office of Nuclear Security and Incident Response (NSIR)
 - Director/Deputy Director, Division of Physical and Cybersecurity Policy
 - Director/Deputy Director, Division of Preparedness and Response
 - Director/Deputy Director, Division of Security Operations
- Office of the General Counsel (OGC)
- Office of Nuclear Materials Safety and Safeguards (NMSS)
 - Director/Deputy Director, Division of Decommissioning, Uranium Recovery, and Waste Programs
 - Director/Deputy Director, Division of Rulemaking, Environmental, and Financial Support

For each of the membership positions, the members may delegate attendance and participation at RP meetings. Designees shall be empowered to act for the members and to allocate resources. The RP is authorized to make decisions when a quorum exists. A quorum shall be defined as consisting of two co-chairs and two other members (or their alternates) present at a meeting. Staff from other offices/regions may assist the RP in its activities.

The RP serves as the focal point for project status and for coordination among Region **[Region number]**, NRR, NSIR, NMSS, OGC, and the Office of Public Affairs (OPA). In addition, the RP facilitates communications with the Commission, the Executive Director for Operations and its office direct reports, the licensee, and other external stakeholders.

OBJECTIVES

The RP's primary objective is to proactively identify and promptly resolve any licensing, inspection, or regulatory challenges that concern the **[Plant name]** restart. To accomplish this objective, the RP provides high-level assessments, coordination, oversight, and management direction of NRC activities associated with the licensing, inspection, testing, and operation of **[Plant name]**. The RP should ensure that risk insights are considered up front in order to ensure the agency's resources are focused on significant items and that appropriate visibility of significant issues is maintained to enable the RP to adjust activities as needed to remain focused on issues of the greatest importance. Each of the NRC offices and associated staff retains responsibility for the activities related to licensing, inspection, and assessment of **[Plant name]** under their purview.

From a licensing perspective, the RP's early focus will be on identifying the regulatory reviews and approvals that are necessary to return the plant to operation and placing them in the appropriate sequence to facilitate implementation and oversight of licensee programs needed to prepare the plant for return to operation (e.g., quality assurance), without restoring requirements sooner than necessary (e.g., operating reactor security and emergency preparedness) and inadvertently putting the licensee into non-compliance. If approved, the sequence will support compliance with applicable requirements for transition from decommissioning to operations.

From an oversight perspective, the RP will ensure that Region **[Region number]**, NRR, and NSIR determine and provide adequate monitoring of those conditions that would need to be observed prior to the plant exiting decommissioning and returning to operating status.

The RP will ensure the review of the emergency preparedness program is properly coordinated with all stakeholders (including FEMA), and that all applicable regulatory requirements for onsite and offsite exercises are met prior to returning the plant to an operating status.

The RP reports to the Director of NRR and the Regional Administrator, Region **[Region number]**. This includes but is not limited to periodic updates, information on license reviews, inspections, operator licensing, and restart activities. The updates will also include the status of hearings, allegations, inspection issues, and licensing activities concerning the project, as applicable. The Director of NRR, Regional Administrator for Region **[Region number]**, and RP co-chairs will determine the frequency of the updates.

SCOPE OF ACTIVITIES

The RP meets its objectives by prioritizing resource management, project planning and execution, communications, and oversight.

RESOURCE MANAGEMENT

The RP facilitates resource prioritization across organizational boundaries to meet inspection and licensing objectives as needed, including resources for the following:

- Inspection

- Licensing
- Return to Reactor Oversight Process

The RP will track and periodically report a summary of resources expended for various efforts (guidance/program development, licensing, oversight, etc.).

PROJECT PLANNING AND EXECUTION

The RP provides oversight for overall project planning among the NRC offices participating in oversight, licensing, and restart activities. The scope of RP activities in this area includes the following:

- Identify and determine the necessary licensing activities and inspections and ensure that they are conducted in a timely manner and integrated with the licensee's schedule to support agency decision-making regarding restart.
- Determine that Project Leads from each of the responsible offices are established and have the authority to commit the organization's resources to meet due dates.
- Facilitate expedited changes to inspection support documents (e.g., procedures, inspection planning documents) as needed, to support timely inspection activities.
- Identify for resolution, by the appropriate office, any inspection, licensing, and restart challenges before they unnecessarily impact project schedules.
- Identify areas for which new regulatory approaches or guidance are needed.

COMMUNICATIONS

The RP serves as the focal point for project status and coordination among the NRC's regional and headquarters offices, including periodic status briefings to the Director of NRR and the Regional Administrator, Region [**Region number**]. The scope of RP communication activities includes the following:

- Maintain a communication plan with input from each of the offices.
- Oversee plan implementation to ensure key stakeholders, including the State of Michigan, are informed of the review status. Coordinate with the OPA, the Office of Congressional Affairs (OCA), and OGC.
- Maintain and periodically issue talking points on the status of the [**Plant name**] project for use in senior NRC management briefings, bringing attention to special issues, as necessary.
- Communicate status of NRC activities, including licensing and technical issues that could impact the project timeline, to the Commission, NRC management, and other stakeholders, as appropriate.
- Conduct periodic meetings with the licensee to discuss progress of inspection, licensing actions, and restart activities.

- Elevate promptly any issues that require NRC office level (or above) engagement with licensee management.
- Ensure effective coordination among NRR, Region [**Region number**], NMSS, NSIR, OGC, OPA, and OCA.
- Conduct periodic public meetings with external stakeholders, as appropriate, for effectiveness, openness, and transparency.
- Ensure that meeting summaries are provided, commitments are tracked, and organizations are accountable for assigned actions.

OVERSIGHT

The scope of RP activities in oversight includes the following:

- Maintain cognizance of the restart activities and conduct periodic meetings among RP members to assess ongoing NRC inspections and to resolve technical and regulatory issues that may arise.
- Oversee coordination of safety, security, and emergency planning interfaces and ensure that issues in these areas are communicated to affected NRC staff.
- Maintain cognizance of inspection performance and associated metrics (technical assistance requests, violations, allegations).
- Identify issues that affect any of these oversight functions and facilitate their timely resolution.
- Provide support to the hearing process.

RP MEETING FREQUENCY

The RP meetings occur twice per quarter to ensure that schedules are met, and new and existing activities are identified and tracked through completion. The RP will meet more frequently if the RP deems it necessary based on pending activities and other stakeholder interest. The RP leverages its meetings with existing management meetings, as practical. The meetings take place near [**Plant name**], the Region [**Region number**] office, or NRC Headquarters. Members attend the meetings in person or through Microsoft Teams.

RP DURATION

The RP will be in effect until the NRC reaches decisions on all the licensing actions, exemptions, technical issues, and inspections required for [**Plant name**] to resume commercial operation or until a point mutually agreed upon by the Director of NRR and the Regional Administrator, Region [**Region number**].

ESTIMATED NUMBER AND FREQUENCY OF PUBLIC MEETINGS

Starting in the first quarter of fiscal year 2024, the RP will hold public meetings with the licensee to discuss the status of the restart program, significant inspection and licensing issues, and the transition to operations. These meetings will take place quarterly; the RP may adjust the frequency based on pending activities and other stakeholder interest.

OUTCOMES

The licensing actions reviewed, and inspections conducted, associated with the review of the **[Plant name]** restart effort will be dispositioned in accordance with the appropriate processes. In addition, the RP will provide a final memorandum to the Director of NRR and Regional Administrator, Region **[Region number]** summarizing the efforts of the RP and providing any recommendations, should other licensees choose to pursue the restart of a reactor in a decommissioning status.

DOCUMENTATION

The RP shall designate a repository of information in addition to the Agencywide Documents Access and Management System where panel members and staff will collaborate.

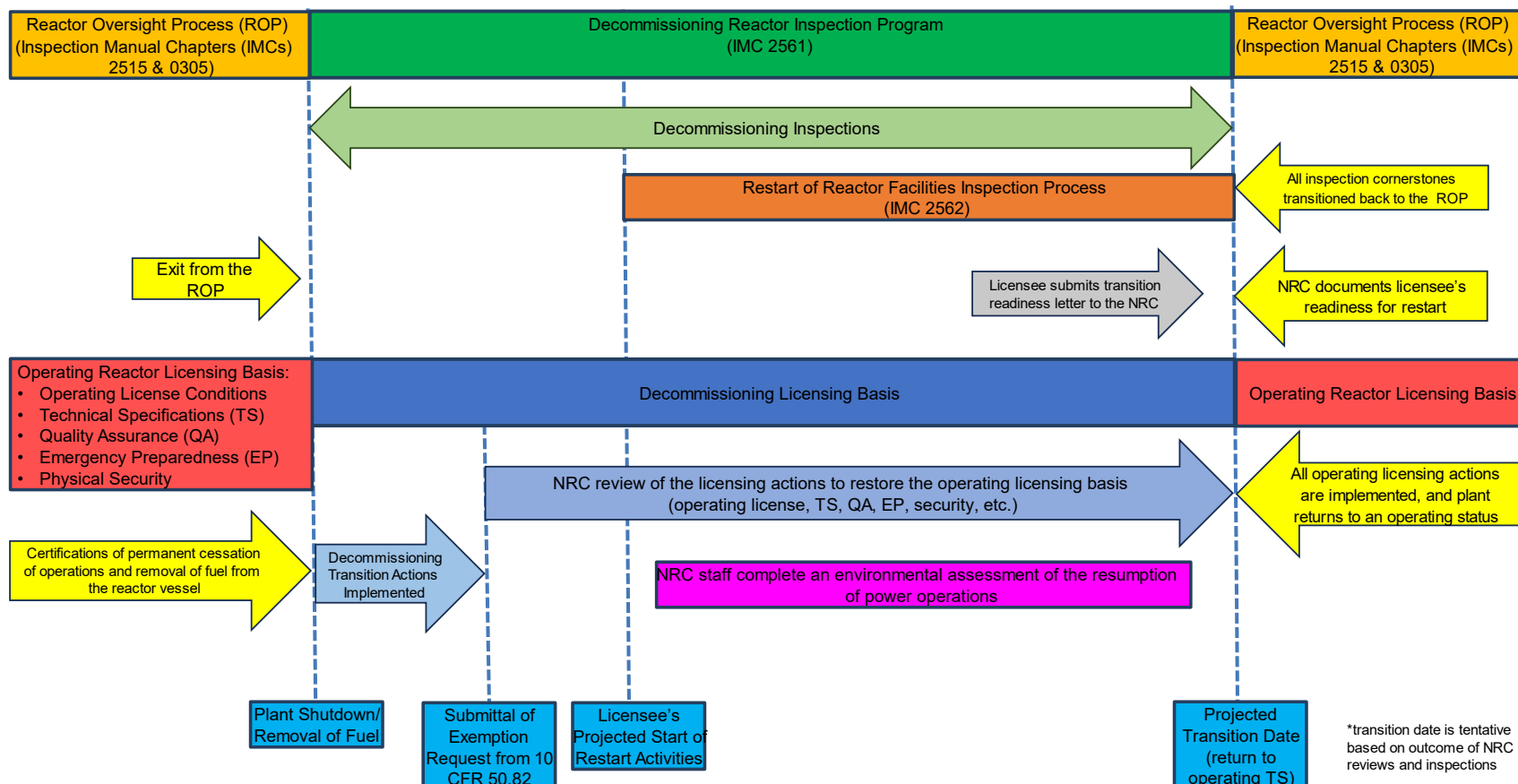
An NRC public webpage will be updated with applicable oversight information associated with the RP.

References:

<https://www.nrc.gov/info-finder/reactors/wb/watts-bar.html>

Attachment 1: Overview of Transition Activities

Licensing and Inspection Transition Activities for Restart Facilities



Attachment 2: Revision History for IMC 2562

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional Non-Public Information)
N/A	ML24033A299 04/23/24 CN 24-013	Initial Issuance. This IMC was developed for the planned restart of Palisades but has been developed so it can be used for any future operating reactor restart action.		ML24033A302